IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

WILLIAM R. RONGEY, incand on behalf of all others si situated,	•)))
	Plaintiffs,)
v.) Case No. 1:18-cv-04613
ANSELMO LINDBERG & ASSOCIATES LLC,)))
	Defendant	

THE PARTIES' JOINT MOTION TO MODIFY DISCOVERY DEADLINES

Plaintiff William R. Rongey ("Plaintiff") and Defendant Anselmo Lindberg & Associates, LLC ("Defendant") respectfully move this Honorable Court, and jointly request that this Court modify the deadlines for discovery in this case, and in support thereof, states:

- 1. Plaintiff's Complaint purports to state claims for violations of the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692-1692p. (Dkt. No. 1.)
 - 2. On February 25, 2019, discovery is set to close.
- 3. Each side has exchanged written discovery requests, and each side has provided responses to written discovery.
- 4. The parties are currently working to resolve any potential disagreements regarding written discovery pursuant to Rule 37.
- 5. Due to the time needed to resolve any issues regarding written discovery, and preexisting time commitments that could not be rescheduled, the parties require additional time to complete oral discovery.
 - 6. This would be the first modification of the discovery schedule.

7. Defendant's counsel and Plaintiff's counsel agree that such a modification would advance the resolution of this case.

WHEREFORE, the parties respectfully request that this Court modify the current discovery deadline, and direct that the deadline for discovery to be completed to be set for April 5, 2019.

Respectfully submitted,

Respectfully submitted,

Sulaiman Law Group, Ltd.

Hinshaw & Culbertson, LLP

/s/ James Vlahakis (with consent)

/s/ Louis J. Manetti, Jr._

One of the Attorneys for Plaintiff

One of the Attorneys for Defendant

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CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2019, a copy of the forgoing Joint Motion to Modify Discovery Deadlines was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

By: /s/Louis J. Manetti, Jr.

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